

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CR. NO. 3:17-688-JFA
)	
v.)	
)	
BRITTANY MARTIN)	

MOTION FOR DOWNWARD DEPARTURE

NOW COMES the United States, by and through its undersigned attorney, and respectfully moves the court, pursuant to 5K1.1 of the United States Sentencing Guidelines and Title 18, United States Code, 3553(e), that this Honorable Court depart downward from the applicable guidelines regarding the defendant, Brittany Martin, and, in support of such motion, does state as follows:

1. Martin was one of sixteen defendants named in a forty-six count Second Superseding Indictment for her role in a heroin and cocaine conspiracy. She was arrested on December 13, 2017. Following her arrest, Martin fully admitted to participating in the charged conspiracy, and, on April 24, 2019, she pled guilty, pursuant to a written plea agreement, to conspiring to distribute and possess with intent to distribute 100 grams or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and 846.
2. Prior to her guilty plea, Martin entered into a proffer agreement and was debriefed by agents with the Drug Enforcement Administration on two occasions. During the course of her debriefings, Martin fully admitted to her participation in the charged conspiracy. She also provided valuable information about many of her co-defendants, including Jermaine Southall, Gabrielle Myers, Bilal Muhammad, Richard Smith, Lee Ball, and Torrance Burman. The information she supplied assisted the Government in confirming the roles of her co-defendants and was used in the Presentence Investigation Reports to

support enhancements for Jermaine Southall and Gabrielle Myers.

3. In addition to providing valuable information about her charged co-conspirators, Martin's information was used by the Government to identify and indict the principal supplier to lead defendant, Jermaine Southall. Martin was debriefed on November 12, 2018 and advised agents that she and her boyfriend, Bilal Muhammad, would transport money from South Carolina to New York City, where they would obtain kilogram amounts of heroin and cocaine from Southall's supplier, whom she knew of as "Kid." Martin described the location where she and Muhammad would meet "Kid." Using Google Maps, Martin was able to point out the precise location where "Kid" resided, and based, in part, on this information, the Government was able to identify "Kid" as Scott Fleming and indict him in the companion case *United States v. Fleming*, 3:19-78-JFA.
4. In summary, the information Martin has provided has facilitated the resolution of several of her charged co-defendants and led to the federal indictment of Scott Fleming. The information and investigative assistance from Martin have proven useful, timely, reliable, and significant. As such, her assistance has been substantial, as contemplated by U.S.S.G. 5K1.1, and the undersigned deems her an appropriate candidate for a downward departure. After a careful review of her cooperation and the assistance it has yielded, the Government recommends a three-level departure from the current Guidelines range followed by an appropriate term of supervised release.

WHEREFORE, the government moves that this Honorable Court grant the Motion for Downward Departure as herein requested in the case of Martin.

Respectfully submitted,

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